

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JONAH M. MEER, AS THE TRUSTEE OF : No. 11-cv-6994 (LAK) (MHD)
THE ACTRADE LIQUIDATION TRUST, not
in his individual capacity, ACTRADE : ECF Case
LIQUIDATION TRUST, the successor to
ACTRADE FINANCIAL TECHNOLOGIES, : Electronically Filed
LTD. and ACTRADE CAPITAL INC.,
ACTRADE INTERNATIONAL CORP., :
ACTRADE FUNDING CORP., ACTRADE
SOUTH AMERICA LTD., ACTRADE
COMMERCE LTD., ACTRADE
RESOURCES, INC. and E-TAD CLEARING :
CENTER, INC., :
Plaintiffs, :
v. :
DELOITTE & TOUCHE LLP, :
Defendant. :
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**NOTICE OF MOTION TO STAY THIS ACTION
OR, ALTERNATIVELY, TO DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE that, upon the Complaint in this action; the accompanying Memorandum of Law in Support of Deloitte & Touche LLP's Motion to Stay This Action Or, Alternatively, to Dismiss the Complaint; the Declaration of Jay B. Kasner, dated November 14, 2011, and the exhibits thereto; and all prior papers and pleadings herein, Defendant Deloitte & Touche LLP will move this Court, before the Honorable Lewis A. Kaplan at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order (A) staying this action or (B) in the alternative, pursuant to Federal Rules of Civil Procedure 12(b)(1) and (6), dismissing the Complaint with prejudice, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
November 14, 2011

By: /s/ Jay B. Kasner

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